From: <u>Carlos Miranda III</u>

To: <u>Christopher V. Arisco</u>; <u>Juan Aguirre</u>

Subject: Re: [External] Case No. 23-30067; In re A&R Chavira, LLC

Date: Friday, February 24, 2023 9:58:37 AM

Good morning. Working on this.

I have 2 mediations today one from 9 to 12 (in 3 minutes) and one from 1 to 5. I will be tied up but available over the weekend. Will stay in touch with you.

On Fri, Feb 24, 2023 at 8:55 AM Christopher V. Arisco < <u>CArisco@padfieldstout.com</u>> wrote:

Carlos,

Just following up on my below inquiry. Please give me a call to discuss.

Best Regards,

Christopher Arisco

Phone: 817-338-1616

Fax: 817-338-1610

From: Carlos Miranda III < cmiranda@eptxlawyers.com>

Sent: Wednesday, February 22, 2023 4:36 PM

To: Christopher V. Arisco < <u>CArisco@padfieldstout.com</u>>

Subject: Re: [External] Case No. 23-30067; In re A&R Chavira, LLC

Got this. In a few meetings. Will start on this.

On Wed, Feb 22, 2023 at 2:12 PM Christopher V. Arisco < <u>CArisco@padfieldstout.com</u>> wrote:

Carlos.

I called your cell and your office and left a VM on your cell and message with your legal assistant. I'm following up with this e-mail. Per the attached document, can you clarify *which* NextGear units are available for pick up on the debtor's lot by year, make, model, and VIN? My client would like that information to assist in the recovery effort.

Also, it is unclear in your list as to how many NextGear units the debtor sold, for how much, and when. For each vehicle referenced as a NextGear vehicle that was sold, can you please provide: (a) the date of sale; (b) sales amount; (c) whether debtor received the sales proceeds; and (d) whether debtor intends on remitting the sales proceeds to NextGear? Your Exhibit "A" suggests that the receivable amount "TO COLLECT" on the NextGear sold vehicles is \$0.00, which makes me think debtor received funding from the sales but hasn't yet accounted for such funds in the bankruptcy.

Please give me a call to discuss.

Best Regards,

Christopher Arisco

Phone: 817-338-1616

Fax: 817-338-1610